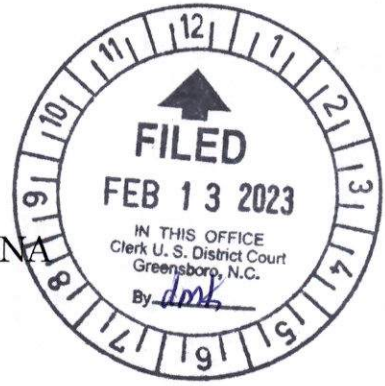


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :
 :
 v. : 1:23CR 61 -1
 :
 DONALD ROBERT LYNCH :

The Grand Jury charges:

On or about March 15, 2022, in the County of Chatham, in the Middle District of North Carolina, DONALD ROBERT LYNCH knowingly and intentionally did unlawfully possess with intent to distribute 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812; in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense alleged in this Indictment, the defendant, DONALD ROBERT LYNCH, shall forfeit to the United States,

pursuant to Title 21, United States Code, Section 853(a), all right, title and interest in and to any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

3. The property subject to forfeiture may include, but shall not be limited to the following:

- a. Springfield .45 caliber handgun, serial number XS542145;
- b. Davis Industries .380 caliber handgun, serial number AP283707;
- c. Colt Commander .45 caliber handgun, serial number unknown;
- d. Beretta 9mm handgun, serial number AXC032307;
- e. Taurus .327 caliber handgun, serial number BX88239;
- f. Ruger 9mm handgun, serial number 311-90093.

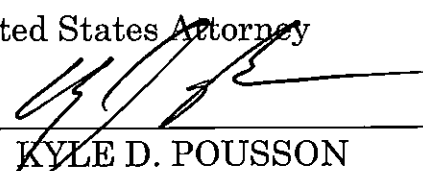
4. If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendants cannot be located upon the exercise of due diligence, has been transferred or sold to or deposited with a third person, has been placed beyond the jurisdiction of the Court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States,

pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in accordance with Title 21, United States Code, Section 853, Rule 32.2, Federal Rules of Criminal Procedure, and Title 28, United States Code, Section 2461(c).

DATED: February 13, 2023

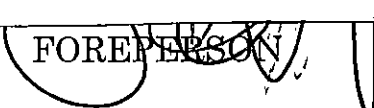
SANDRA J. HAIRSTON
United States Attorney



BY: KYLE D. POUSSON
Assistant United States Attorney



A TRUE BILL



FOREPERSON